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April 17, 2025

**VIA ECF**

The Honorable Harvey Bartle III  
United States District Judge  
Eastern District of Pennsylvania  
16614 U.S. Courthouse, Courtroom 16-A  
601 Market Street  
Philadelphia, PA 19106

**Re: *Atlas Data Privacy Corp. et al v. Innovative Web Solutions, LLC et al.***  
**Case No.: 1:25-cv-01535-HB**  
**GRSM File No.: 1385011**

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Dear Judge Bartle:

This firm represents the interests of Defendant in the above-referenced matter. We write in response to the Court's April 2, 2025 Order (ECF No. 13) to advise the Court that Defendant joins in the consolidated motion to dismiss for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2)<sup>1</sup> (the "Personal Jurisdiction Motion") and the consolidated motion to dismiss failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6)<sup>2</sup> (the "12(b)(6) Motion"). In accordance with Your Honor's April 2, 2025 Order, Defendant has also filed a supplemental motion to dismiss for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2). *See* ECF No. 15.

For the reasons set forth in the Personal Jurisdiction Motion, the 12(b)(6) Motion, and Defendant's supplemental motion to dismiss for lack of personal jurisdiction, Defendant respectfully requests that the Court grant the motions in their entirety and dismiss Plaintiffs' Complaint with prejudice.

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<sup>1</sup> *See Atlas Data Privacy Corp. et al. v. GoHunt LLC, et al.*, Case No. 1:24-cv-04380, ECF No. 42

<sup>2</sup> *See Atlas Data Privacy Corp. et al. v. We Inform, LLC, et al.*, Case No. 1:24-cv-04075, ECF No. 59.

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Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI, LLP

*/s/ Clair E. Wischusen*

Clair E. Wischusen, Esq.

CC: All counsel of record via ECF